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Amy, Erika, Tori, Jenny, and Jessica

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

“AMY,” “ERIKA,” JANE SMITH as next of friend for “TORI” minor, “JENNY,” “JESSICA,” “LILY,” “SARAH,” JANE DOE as court appointed conservator for “SKYLAR” and “SAVANNAH” minors, JOHN DOE as court appointed conservator for “SALLY” and “SIERRA” minors, “MAUREEN,” WILLIAM L.E. DUSSAULT as Guardian ad Litem for “VIOLET” minor, and JANE ROE as next friend for “PIA,” and “MYA,”

## Plaintiffs.

NO. 19 CV 2184 PJH

**CORRECTED DECLARATION OF  
CAROL L. HEPBURN IN SUPPORT OF  
RESPONSE TO DEFENDANT'S MOTION  
TO DISMISS FOR FAILURE TO STATE A  
CLAIM ON WHICH RELIEF CAN BE  
GRANTED**

## NOTE ON MOTION CALENDAR:

Date: August 28, 2019

Time: 9:00 a.m.

Judge: Honorable Phyllis J. Hamilton  
Chief United States District Judge

1 v.  
2  
3

4 RANDALL STEVEN CURTIS,  
5  
6

7  
8  
9  
Defendant.  
10

11 CAROL L. HEPBURN hereby declares the following to be true and correct under the  
12 laws of the State of Washington:  
13

14 1. I am an attorney licensed to practice law in the States of Washington and  
15 Oregon.  
16

17 2. I represent the Plaintiffs herein. I make this Declaration in support of Response  
18 To Defendant's Motion To Dismiss For Failure To State A Claim On Which Relief Can Be  
19 Granted.  
20

21 3. Attached hereto as Exhibit 1 is a true and correct copy of the Transcript of  
22 Proceedings of guilty plea hearing in *United States v. Randall Steven Curtis*, United States  
23 District Court, Northern District of California, No. 3:16-cr-00510-SI.  
24

25 4. Attached hereto as Exhibit 2 is a true and correct copy of the Victim Notification  
System notification which I received on behalf of the victims Lily, Sarah, Sierra, Skylar,  
Violet, Sally, Savannah, Maureen, Pia and Mya from the United States Department of Justice  
regarding Randall Steven Curtis. Their legal names are redacted to preserve their anonymity.  
26

5. Attached hereto as Exhibit 3 is a true and correct copy of the July 6, 2018  
Stipulation Regarding Restitution to Claimants Other Than “CC” filed at ECF 90 in *United  
States v. Randall Steven Curtis*, United States District Court, Northern District of California,  
No. 3:16-cr-00510-SI.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Amended Judgment filed at ECF 114 in *United States v. Randall Steven Curtis*, United States District Court, Northern District of California, No. 3:16-cr-00510-SI.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Amy, Vicky and Andy Child Pornography Victim Assistance Act of 2018, as retrieved from congress.gov today.

DATED this 28th day of August, 2019 at Seattle, WA.

s/Carol L. Hepburn  
CAROL L. HEPBURN